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Sent: Friday, April 02, 2010 11:06

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Subject: EPA comments on the Draft Final Rad Addendum to the RI/FS for Parcel E-2, Hunters Point Shipyard

Keith, here are our comments on the above document. Rob Terry is out of town this week, so I'll find out on Monday whether he has anything to add. If so, I'll request a one-week extension.

## USEPA Comments on the Draft Final Radiological Addendum for Parcel E-2 RI/FS

- 1) Section 4.2 (and 8.4.1) should provide an explanation of the implications of the possible radiological components in the landfill. Simply listing sand blast grit and materials from radiological experiments is insufficient. What could be contained in the sand blast grit and what potential activity or risk could it pose. What materials were used in the labs, what's their half life, potential quantities, risk, etc? One of the community's biggest concerns at HP is radiological contaminants in the landfill, and you can't invoke the presumptive remedy as a reason not to provide some justification for applying a presumptive containment remedy, since the presumptive remedy wasn't written to cover industrial radioactive wastes. This is the type of information that we expect to be covered as described in Steps 1-4 in Section 8.4.1. The removal in the PCB hot-spot area mentioned in Section 8.4.1 found luminescent devices, but is not indicative of NRDL wastes in the main portion of the landfill.
- 2) Section 4.3, Third Paragraph: There is a typo in the first sentence, "Ra-226 was reported in 1,118 of the 1,116 samples analyzed". The order was either reversed or one of the numbers is incorrect.
- 3) Section 4.3: Why would Cs-136 and Ra-226 be found in 99% of the samples and in such a large number of the survey units above the release criteria, especially since the Phase V survey was performed after the installation of the landfill cap and cover? A Remedial Investigation Report should present the results in a more thorough and quantitative manner. Please expand the discussion on possible sources and release mechanisms, the overall level of detail and include a figure like Figure 5 with colored or sized circles representing the results. The figure should note whether individual anomalies were then removed. Also, how did the metal slag area removal affect the results?
- 4) Section 12 lists removal of sewers, storm and septic lines in areas outside of the landfill proper. Please discuss the possibility of preferred pathways posed by the lines inside the landfill. A remedy for the lines that extend into the landfill such as removal, capping or grouting may be appropriate.
- 5) Figure 10: Please identify which alternatives or which areas each of the cover types apply to. Please also identify the design of the existing landfill cap which is not proposed for modification in Alternatives 3 and 4.
- 6) Department of Fish and Game has questioned the lack of a biotic barrier in the cover and cap designs. This is an important design consideration that must be addressed or justified.